

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1(b)

Robertson, Anschutz, Schneid, Crane & Partners, PLLC  
130 Clinton Road, Lobby B, Suite 202  
Fairfield, NJ 07004  
Telephone: 973-575-0707  
Facsimile: 973-404-8886  
Attorneys for Secured Creditor

Kimberly A. Wilson, Esquire  
NJ BAR ID 031441997

In Re:

**Jeanne Puzino,**

**Debtor.**

Case No.: 22-18053-VFP

Chapter: 13

Hearing Date: March 2, 2023

Judge: Vincent F. Papalia

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR  
STAY**

HEARING DATE AND TIME:  
March 2, 2023 at 10:00 a.m.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT  
OPPOSITION IS TIMELY FILED**

TO:

<b><i>Debtor(s)-</i></b> JEANNE PUZINO 18 NELL COURT FAIRFIELD, NJ 07004 <b><i>Co-Debtor-</i></b> Vincent Puzino 18 NELL COURT FAIRFIELD, NJ 07004	<b><i>Debtor's Attorney-</i></b> Avram D White Law Offices of Avram D White, Esq 66 Hampton Terrace Orange, NJ 07050	<b><i>Trustee-</i></b> Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004- 1550	<b><i>U.S. Trustee-</i></b> U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102
---	---	--	---

PLEASE TAKE NOTICE that on March 2, 2023 at 10:00 a.m., or as soon thereafter as  
counsel may be heard, Robertson, Anschutz, Schneid, Crane & Partners, PLLC, attorneys for

Selene Finance LP as servicer for U.S. BANK TRUST NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE FOR VRMTG ASSET TRUST, the within creditor ("Creditor"), shall move before the Honorable Vincent F. Papalia, United States Bankruptcy Judge, at 50 Walnut Street, Newark, NJ 07102, Courtroom 3B, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay and Co-Debtor Stay pursuant to 11 U.S.C. 1301 or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, NJ 07102**, and simultaneously served on Secured Creditor's counsel, **Robertson, Anschutz, Schneid, Crane & Partners, PLLC, 130 Clinton Road, Suite 202, Fairfield, New Jersey 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: January 27, 2023

Robertson, Anschutz, Schneid, Crane & Partners, PLLC  
130 Clinton Road, Lobby B, Suite 202  
Fairfield, NJ 07004  
Telephone No.: 973-575-0707 (local)  
Telephone No.: 561-241-6901 (main)  
By: /s/ Kimberly A. Wilson  
Kimberly A. Wilson, Esquire  
Bar ID: 031441997  
Email: [kimwilson@raslg.com](mailto:kimwilson@raslg.com)